



July 11, 2023

**VIA ECF**

Honorable Andrew L. Carter, Jr., U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007

**Re: ADN Jeans Group, LLC v. Mundi Trade, Inc. - No. 23-cv-02862-ALC  
Response to Request to Remove Counsel of Record**

Dear Judge Carter:

This firm is counsel to Defendant, Mundi Trade, Inc. (“Defendant” or “Mundi”) in the above referenced matter. We are receipt of the request made by Ronald Adelman, Esq. to be removed as counsel of record [Dkt. 18] for Plaintiff in this matter. While Mundi does not object to the removal/withdrawal of Mr. Adelman, it respectfully objects to the request for a stay of any kind which has not been briefed and, in any event, does not seem appropriate.

Per Mr. Adelman’s letter, “[the Stropheus Firm] will continue to represent Plaintiff as far as [he] knows,” the Stropheus firm has multiple attorneys, and, at present, all that is pending is Mundi’s request for a pre-motion conference seeking leave to file a motion to dismiss per F.R.C.P. 12(b)(6). There is no need to delay resolution of that issue and the Stropheus firm is free to have another associated attorney enter an appearance as counsel of record at any time.

Respectfully submitted,  
/s/ Christian Jensen  
Christian Jensen

cc: Plaintiff’s counsel (via ECF)

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